

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

[illegible]

ELEANOR L. POLIMENI, being duly sworn, deposes and says:

1. That I am a partner in the law firm of Finkelstein & Partners, LLP and I make this affidavit in support of the application for fees in *Serin v. NLS*.
2. That I was admitted to practice in the Courts of the State of New York on February 12, 1980.
3. That I am admitted to the United States District Court for the Southern, Eastern, Northern and Western Districts of New York, as well as the United States Court of Appeals for the Second Circuit.
4. That I have been a member of the Finkelstein Law Firm since July 17, 1989.
5. That I manage the federal department for the firm, and thus am involved in all federal cases brought by the Finkelstein firm, as well as two firms that the Finkelstein firm is affiliated with: Jacoby & Meyers, LLP and Fine, Olin & Anderman.
6. That my primary responsibility is developing the cases from the time the case is commenced through discovery and the filing of pre-trial submissions, as well as drafting in limine motions and preparing in the oppositions to summary judgment motions.
7. That I also assist with complex products liability cases that have been commenced by my firm in both federal and state court, including but not limited to, working with various expert witnesses in addressing liability issues that arise in these litigations.
8. In addition, I have been involved in several federal and state declaratory judgment actions that dealt with the denial of insurance coverage for various reasons including late notice and fraud.

9. That I am liaison counsel in a multi-district litigation pending in the United States District Court for the District of Massachusetts, a pharmaceutical case against a major drug company.
10. I also assist in other mass tort cases venued in federal and state courts throughout the country in the preparation of pre-trial and other court submissions.



Eleanor L. Polimeni, Esq.
Finkelstein & Partners, LLP
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Newburgh, NY 12551
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epolimeni@lawampm.com
Co-Counsel for Plaintiffs

Dated: December 31, 2010

Steve Lim | Partner | Newburgh

Areas of Practice

Personal Injury

Education

State University of New York at Stony Brook, B.A.
Georgetown University, J.D.

Admissions

New York

United States District Court
Southern, Eastern, Northern
And Western Districts of New York

Memberships

New York State Bar Association

United States Court of Appeals
Second Circuit



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Steven Lim, Esq. – Tally of Hours for *Serin v. Northern Leasing Systems, Inc.*

10/28/10 - review file on LEXIS	0.5 hrs
11/05/10 - research re P's expert relying solely on P's testimony	2.5 hrs
11/10/10 - review Defs' MIL; edit draft Ps' mem opp Defs' MIL	2.0 hrs

With motions department at Finkelstein for last 22 1/2 years, working on pleadings, motion papers, appeals, legal research.

Last 6-7 years working predominantly on mass torts cases.

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Gail Schlanger | Attorney | Newburgh

Gail Schlanger is an attorney with the firm's Mass Tort Litigation Department, which handles cases involving clients and their loved ones who have been injured or killed by defective drugs and medical devices. Gail has been an attorney with the firm since 2005, and has briefed critical issues on behalf of the firm and its clients, including preemption and *Daubert*, for cases filed in the Multidistrict Litigation *In re Neurontin Marketing, Sales Practices and Products Liability Litigation*, which is under the auspices of the Honorable Judge Patti B. Saris, District Judge, United States District Court for the District of Massachusetts. Ms. Schlanger is focused on Mass Tort pleadings, legal research and motion practice.

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Areas of Practice

Personal Injury
Mass Torts

Education

Bernard Baruch College, B.A.
magna cum laude

State University of New York
at Buffalo School of Law, J.D.

Summer Internship

Pro Se Office of the United
States District Court
for the Southern District
of New York.

Admissions

New York

Judicial Clerkship

Judicial Clerkship Program,